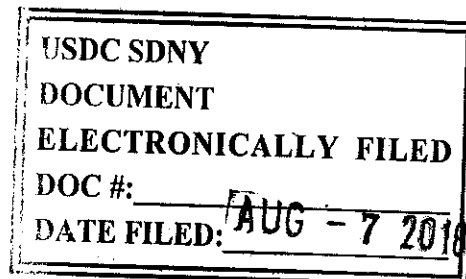


SHER TREMONTE LLP

July 24, 2018



BY ECF

The Honorable Lewis A. Kaplan
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Dumitru*
(18 Cr. 243 (LAK))

Dear Judge Kaplan:

We represent Andreea Dumitru in the above-captioned action. We write to respectfully request that the Court modify the terms of Ms. Dumitru's pretrial conditions. On March 28, 2018, Ms. Dumitru was released on a \$200,000 personal recognizance bond, ultimately co-signed by two financially responsible persons. Pursuant to the terms of the current bond, Ms. Dumitru's travel is restricted to the Southern, Eastern and Northern Districts of New York.

We write to respectfully request that the Court modify Ms. Dumitru's bond to permit her to take a one-week family vacation from August 25, 2018 through August 31, 2018. During this vacation, Ms. Dumitru, accompanied by her boyfriend and daughter, plan to drive to three states in the Northeast portion of the United States: Massachusetts, Maine, and Vermont. Her proposed itinerary is as follows:

- August 25: NYC to Boston, Massachusetts
- August 26: Boston to Bar Harbor, Maine
- August 29: Bar Harbor to Killington, Vermont
- August 30: Killington to Cape Cod, Massachusetts
- August 31: Cape Cod back to NYC

Ms. Dumitru will still be obligated to comply with the other conditions of her release, including pretrial supervision as directed by pretrial services.

We have spoken with the government and pretrial services and they have no objection to the requested modification.

Gracie Rose
Consent
SO ORDERED
Stefan L. Kaplan
LEWIS A. KAPLAN, USDJ

The Honorable Lewis A. Kaplan
July 24, 2018
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We appreciate the Court's consideration.

Respectfully submitted,

/s/ Justin Sher

Justin Sher
Emma Spiro

cc: All counsel of record (by ECF)



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 25, 2018

BY ECF

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Andreea Dumitru*, 18 Cr. 243 (LAK)

Dear Judge Kaplan:

The Government respectfully submits this letter in response to the defendant's letter, dated July 24, 2018 (Dkt. No. 22), requesting that the Court modify the conditions of the defendant's bail. As the defendant's letter indicates, the Government has no objection to the proposed modification.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By: *Robert B. Sobelman*
Alison G. Moe
Robert B. Sobelman
Assistant United States Attorneys
(212) 637-2225/2616

cc: Justin Sher, Esq. (by ECF)
Emma Spiro, Esq. (by ECF)